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May 11, 2018

Honorable Ronnie Abrams
United States District Court Judge
United States Courthouse
40 Foley Square
New York, New York 10007

Re: United States v. John Galanis,
16 CR 371 (RA)

Your Honor,

I am writing to respond to the government's latest *Motion in Limine*. It is counsel's reading of that motion that the Government is seeking to stop defense counsel from cross-examining members of the Wakpamni Lake Community Corporation (WLCC) about the legality of their pay day loan business and whether the individuals involved are committing a criminal act by being involved in the pay day loan business. The government specifically states at p. 8 of their motion:

The WLCC witnesses are adamant that their involvement in high interest lending is legal by virtue of their sovereign immunity. They are bolstered in this belief by the advice of their counsel. And while the government believes the WLCC is wrong, the issue is not firmly decided. Thus, whether the WLCC is right or wrong is irrelevant and their involvement in such lending in no way weighs on their credibility.

I can inform the Court that defense counsel has no intention of cross examining any witness on the legality of the payday loan business. I understand the argument of the WLCC that sovereign immunity allows them to conduct such a business and will not challenge them on this topic. Thus, I believe the government's motion is moot.

However, this does not stop defense counsel from cross-examining the witnesses about their acts within the payday loan business that are probative of their character for truthfulness or untruthfulness pursuant to Fed. R. Evid. 608(b)(1).

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Finally, Mr. Galanis joins in Defendant, Devon Archer's Motion In Limine filed on May, 10, 2018.

Most Respectfully,


David Touger, Esq.

cc.: All Government counsel